



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

June 1, 2015

M. L. Ulmer, Commander
Naval Support Activity, Washington
1411 Parsons Avenue St, Ste 303,
Washington Navy Yard, DC 20374-5003

Re: Docket Number 03-2015-004-NN
Notice of Noncompliance
Washington Navy Yard Public Water System
PWS ID No DC0000003

Dear Commander Ulmer:

This Notice of Noncompliance and Request for Information is being issued pursuant to Section 1414(a) and Section 1445(a) of the Safe Drinking Water Act (SDWA), 42 U.S.C. §§ 300g-3(a) and § 300j-4(a). According to our records, the Washington Navy Yard public water system (WNY PWS), owned and operated by the United States Navy, has violated certain provisions of the SDWA, 42 U.S.C. §§ 300f-300j-26, and the National Primary Drinking Water Regulations (NPDWR) found at 40 CFR Part 141.

Notice of Noncompliance

The WNY PWS is required to monitor for total coliform bacteria in accordance with the NPDWRs at 40 CFR §141.21 and a sampling plan approved by EPA. A routine sample collected on May 8, 2015, at Building 111 was positive for total coliform. The laboratory notified WNY of the results at 7:00 pm on May 11, 2015. If a routine sample is total coliform-positive, the PWS must collect a set of repeat samples within 24 hours of being notified of the positive result, which would have been May 12, 2015, at 7:00 pm. On May 13, 2015, WNY PWS collected repeat samples from the original (Building 111), downstream, and upstream locations, all of which were total coliform-negative. Because WNY PWS failed to collect a set of repeat samples within 24 hours of notification, WNY PWS has violated 40 CFR §141.21(b).

Public notification is required for this violation. Failure to comply with 40 CFR §141.21(b) requires a Tier 3 level public notice and must be completed within 365 days of the initial violation, and therefore is required to be performed before May 12, 2016. Please note that the violation must be listed in the Consumer Confidence Report that covers the 2015 calendar year.

To reduce the risk of incurring similar violations in the future, EPA strongly encourages the Navy to develop and implement a notification plan with its sampling and laboratory contractors so that

the Navy becomes aware of acute or microbial contamination at the earliest possible time. Such a notification plan would include, but not be limited to, providing telephone and/or electronic communication contacts that will be available outside of the Navy's work day, and a confirmation process to ensure that messages are received by the Navy. The Navy should also ensure adequate personnel coverage for communication and response both during and outside work hours.

If you have any questions regarding the above, please contact Lisa Donahue at 215-814-2062 or donahue.lisa@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen D. Johnson". The signature is fluid and cursive, with the first name "Karen" being more prominent.

Karen D. Johnson, Chief
Ground Water and Enforcement Branch

Cc: Durant Graves, Installation Environmental Program Manager (electronic copy)
Tawana Spencer, NAVFAC (electronic copy)